

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

PARK CONSULTING GROUP, a Michigan
limited liability company, and PW MI CANRE
MARENGO, LLC, a Michigan limited liability
company,

Plaintiffs,

v

MARENGO TOWNSHIP, a Michigan civil
township,

Defendant.

Case No. 1:22-cv-00321

HON. HALA Y. JARBOU

**STIPULATION TO STRIKE ECF
NO. 11, REMOVE IT FROM
PUBLIC VIEW, AND PERMIT
DEFENDANT TO FILE AN
AMENDED RESPONSE TO
PLAINTIFFS' RULE 57 MOTION
FOR EXPEDITED HEARING**

Ethan R. Holtz (P71884)
Salvatore A. Amodeo (P80290)
Jaffe, Raitt, Heuer & Weiss, P.C.
Attorneys for Plaintiffs
27777 Franklin Road, Suite 2500
Southfield, MI 48034
(248) 351-3000
eholtz@jaffelaw.com
samodeo@jaffelaw.com

Shaina R. Reed (P74740)
Christopher S. Patterson (P74350)
Matthew A. Kuschel (P76679)
Fahey Schultz Burzych Rhodes PLC
Attorneys for Defendant
4151 Okemos Road
Okemos, MI 48864
(517) 381-0100
cpatterson@fsbrlaw.com
sreed@fsbrlaw.com
mkuschel@fsbrlaw.com

Thomas R. Meagher (P32959)
Daniel S. Zick (P77950)
Foster, Swift, Collins & Smith, P.C.
Attorneys for Defendant
313 S. Washington Square
Lansing, MI 48933
(517) 371-8100
tmeagher@fosterswift.com
dzick@fosterswift.com

STIPULATION

On April 7, 2022, Plaintiffs filed their Motion for Expedited Hearing Pursuant to Fed. R. Civ. P. 57 (ECF No. 10). On April 21, 2022, Defendant filed its Response to Plaintiffs' Motion for Expedited Hearing Pursuant to Fed. R. Civ. P. 57 (ECF No. 11). Inadvertently included among the exhibits attached to Defendant's Response was confidential information of Plaintiffs that should have been redacted and/or omitted from public view.

To the correct the above oversight, the Parties jointly request that that the Court (1) strike Defendant's Response to Plaintiffs' Motion for Expedited Hearing Pursuant to Fed. R. Civ. P. 57 (ECF No. 11); (2) remove Defendant's Response from the docket and public record as if it were not filed; and (3) permit Defendant to re-file its Response with properly redacted exhibits.¹

SO STIPULATED.

Dated: April 22, 2022

Foster, Swift, Collins & Smith, P.C.
Attorneys for Defendant

/s/Daniel S. Zick (P77950)
Daniel S. Zick (P77970)

Dated: April 22, 2022

Fahey Schultz Burzych Rhodes PLC
Attorneys for Defendant

/s/Shaina R. Reed (P74740)
Shaina R. Reed (P74740)

Dated: April 22, 2022

Jaffe, Raitt, Heuer & Weiss, P.C.
Attorneys for Plaintiffs

/s/Ethan R. Holtz (P71884)
Ethan R. Holtz (P71884)

¹ Nothing herein shall be deemed by the Court as an acceptance of or waiver by Plaintiffs of any non-conformance of Defendant's Response with the Local Rules of Civil Procedure and Plaintiffs hereby full reserve their rights as to same.

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED that Defendant's Response to Plaintiffs' Motion for Expedited Hearing Pursuant to Fed. R. Civ. P. 57 is stricken and removed from the docket and public record as if it were not filed, and Defendant is permitted to re-file its Response to Plaintiff's Motion for Expedited Hearing to replace its original Response.

Dated: April 22, 2022

/s/ Hala Y. Jarbou
HALA Y. JARBOU
UNITED STATES DISTRICT JUDGE